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Attorneys for Defendant

Shriners Hospitals For Children

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

ROSE HOLLIS, an individual,

Plaintiff,

v.

SHRINERS HOSPITALS FOR CHILDREN, a
corporation,

Defendant.

Case No. 3:24-cv-01024-AN

**DEFENDANT'S UNOPPOSED
MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

LOCAL RULE 7-1 CERTIFICATION

The parties conferred on August 28, 2024, regarding the subject of this motion, and Plaintiff's counsel does not oppose Defendant's request for an extension of time.

MOTION

Pursuant to Local Rule 16-3(a), Defendant Shriners Hospitals for Children ("Shriners Children") respectfully moves the Court for an order granting a 14-day extension of time for

Shriners Children to respond to Plaintiff's Complaint (Dkt. No. 1). The response is currently due by September 10, 2024.¹ This is Shriners Children's first motion for an extension of deadlines in this case. Plaintiff's counsel does not object and has agreed Shriners Children can file this motion unopposed.

Good cause exists for the requested extension. The undersigned counsel face preexisting deadlines and obligations in other matters—including but not limited to out-of-state deposition travel the week of September 2, a summary judgment reply deadline of September 6, and a mediation statement deadline of September 9—that give rise to their need for additional time to fully assess and respond to the Complaint. Although Plaintiff's counsel has brought a number of prior lawsuits against Shriners Children that have been very similar to one another, the Complaint in this matter presents significant differences, including novel claims that have not yet been briefed and class action treatment. This Complaint's novelty compounds Shriners Children's need for additional time to respond to it.

The requested 14-day extension would require Shriners Children to file its response on or before September 24, 2024. Shriners Children makes this motion in good faith and not for the purpose of delay.

¹ Shriners Children's registered agent was served with the Complaint and a purported summons on August 20, 2024. Though Shriners Children treats this process service as sufficient for purposes of this Motion, the docket does not reflect that the Court's Clerk was ever presented with or issued the Summons for service as required by Fed. R. Civ. P. 4 and LR 4-1. The putative summons with which Shriners Children was served did not bear the Court Clerk's signature or seal as required. Though Plaintiff similarly has yet to file any proof of service, Shriners Children proceeds on the basis that its current response deadline is 21 days following August 20, 2024, per Fed. R. Civ. P. 12(a)(1)(A)(i).

DATED this 28th day of August, 2024.

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